

Records of Frederick County, Maryland, in Liber 267, Folio 113; that said original deed is filed herewith, is marked "Exhibit A" and is prayed to be taken as a part hereof; that no administration has ever been had upon the estate of the said Charles E. Strippy.

SECOND: That they have entered into a contract of sale to sell and convey said real estate unto Marvin B. Payne and Audrey L. Payne, his wife; that said duly executed contract of sale is filed herewith, is marked "Exhibit B", and is prayed to be taken as a part hereof; that said contract of sale has been signed on behalf of the Respondent herein by her mother, Fannie F. Strippy, Widow, one of the Complainants herein, as her parent, natural guardian and next friend.

THIRD: That the said Cleda F. Strippy has been hospitalized for the past seven (7) years at the Springfield State Hospital, in Sykesville, Maryland, and the Complainants believe, and therefore aver, that the said Cleda F. Strippy is incompetent and, therefore, is incapable of executing a valid contract of sale or deed; that notwithstanding this, the Complainants believe, and therefore aver, that the sale of the said property, including the interest of the said Respondent, Cleda F. Strippy, would be for her best interest and advantage.

FOURTH: That the Complainants believe, and therefore aver, that the aforementioned real estate is not susceptible to division in kind and that a sale thereof as contemplated by the hereinbefore referred to contract of sale is in the best interest of all of the parties hereto.

WHEREFORE, the Complainants pray as follows:

1. That your Honors may appoint a guardian ad litem for the said Cleda F. Strippy, to appear and answer for her and to protect her interest in these proceedings.
2. That the hereinbefore referred to contract of sale, being marked "Exhibit B" be ratified and confirmed as to the interest of the said Cleda F. Strippy.
3. That your Honors may appoint a Trustee to convey the interest of the said Cleda F. Strippy in and to the real estate and improvements